

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

MARK BROACH,

Plaintiff,

vs.

CITY OF CINCINNATI,

Defendant.

Case No. 1:12-cv-00066

**MAGISTRATE JUDGE
STEPHANIE K. BOWMAN**

AGREED PROTECTIVE ORDER

The parties agree to enter into this agreed protective order until further order of the Court.

Plaintiff has medical records which plaintiff deems protected by physician-patient or psychologist-patient privilege but which will be produced in discovery in this case. These records shall be subject to discovery between and among the parties but shall otherwise be kept confidential.

By agreement of the parties, these confidential medical records shall be held strictly confidential by counsel for each party and may only be disclosed to counsel for each party, the parties, witnesses who need to know the material, and expert witnesses retained by counsel for each party. None of the documents covered by this protective order may be disclosed to any other person, City of Cincinnati employees, or member of the public. All documents produced under this protective order must be clearly marked "confidential." If any document subject to this protective order is copied, used in a deposition, or at trial, it shall be marked prominently with the word "confidential." Any document subject to this order used at trial, in discovery, in a deposition, expert report, pleading, or in way so as to make it a potentially public record, it shall be so submitted "under seal."

At the conclusion of the litigation, all written materials, including copies made thereof, subject to this protective order shall be returned to counsel who produced the materials.

IT IS SO ORDERED.


MAGISTRATE JUDGE STEPHANIE K. BOWMAN

Agreed to by:

/s/ Jennifer L. Branch
Jennifer L. Branch (0038893)
Attorney for Plaintiff

/s/ Augustine Giglio
Augustine Giglio (0031911)
Attorney for Defendant